

1 BARBARA HART (*pro hac vice*)
2 DAVID C. HARRISON (*pro hac vice*)
3 JEANNE D'ESPOSITO (*pro hac vice*)
4 LOWEY DANNENBERG COHEN & HART, P.C.
5 One North Broadway, Suite 509
6 White Plains, NY 10601-2310
7 Telephone: 914-997-0500
8 Facsimile: 914-997-0035

9 *Lead Counsel for the New York City Pension Funds and the Putative Class*

10 WILLEM F. JONCKHEER S.B.N. 178748
11 SCHUBERT JONCKHEER KOLBE & KRALOWEC LLP
12 Three Embarcadero Center, Suite 1650
13 San Francisco, CA 94111
14 Telephone: 415-788-4220
15 Facsimile: 415-778-0160

16 *Local Counsel*

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN JOSE DIVISION

20 IN RE JUNIPER NETWORKS, INC.
21 SECURITIES LITIGATION

No. C 06-04327-JW (PVT)

**DECLARATION OF DAVID HARRISON IN
FURTHER SUPPORT OF MOTION FOR
SANCTIONS AGAINST DEFENDANT ERNST
& YOUNG LLP**

DATE: Upon submission
TIME:
BEFORE: Hon. Patricia V. Trumbull

1
2 I, David Harrison, declare pursuant to 28 U.S.C. § 1746, as follows:

3 1. I am shareholder of the law firm of Lowey Dannenberg Cohen & Hart, P.C.,
4 counsel of record for Lead Plaintiff The New York City Pension Funds. I make this Declaration
5 in Further Support of Lead Plaintiff's Motion for Sanctions Against Defendant Ernst & Young
6 ("EY").

7 2. Attached hereto as Exhibit A is a true and correct copy of a letter from David
8 Friedman, counsel for E&Y, to David Harrison, dated March 11, 2010.

9 3. In December 2009, counsel for all parties had several conversations regarding the
10 effect on the Court's Order of December 9, 2009 on the depositions of certain witnesses.
11 Eventually, counsel for all parties agreed to postpone the depositions of several Juniper and EY
12 witnesses for whom the scope of questioning would depend upon the Court's final determination
13 of Defendants' claims of privilege.

14 4. During the period of November 2009 through January 2010, Lead Plaintiff took
15 the depositions of 10 Juniper witnesses and 5 EY witnesses.

16 I declare under penalty of perjury that the foregoing is true and correct.

17 Executed this 16th day of March, 2010 in White Plains, New York.

18
19 /s/
20 DAVID HARRISON
21
22
23
24
25
26
27
28